

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff, Case No.

v. Judge

DAWN TOWER,

Defendant.

COMPLAINT

Plaintiff, United States of America, by its attorneys, MATTHEW SCHNEIDER, United States Attorney, and JACQUELINE M. HOTZ, Assistant United States Attorney, both for the Eastern District of Michigan, for its complaint against DAWN TOWER, states as follows:

1. This is a civil action brought on behalf of the United States of America, and the Court has jurisdiction over this action by virtue of 28 U.S.C. §1335.
2. Defendant resides within the jurisdiction of this Court.
3. Defendant became indebted to Plaintiff in the amount of \$11,735.21.
4. Defendant has executed an Agreement for Pretrial Diversion ("Agreement") to satisfy this debt. A copy of the Agreement is attached hereto as (Exhibit A).

5. A fully executed Consent Judgment is being lodged with the Court contemporaneously with filing of this complaint.

6. Defendant has waived notice of entry of the judgment.

WHEREFORE, Plaintiff, United States of America, seeks judgment against Defendant, DAWN TOWER for \$11,735.21 as of November 30, 2020, plus interest from the date of judgment at the legal rate in effect on such date, and any other relief deemed appropriate by the Court.

Respectfully submitted,

MATTHEW SCHNEIDER
United States Attorney

By: s/Jacqueline M. Hotz
JACQUELINE M. HOTZ
Assistant U.S. Attorney
211 W. Fort St., Ste. 2001
Detroit, Michigan 48226
Phone: (313) 226-9108
E-mail: jackie.hotz@usdoj.gov
MI Bar No. P35219

Dated: November 30, 2020